

CALAVERAS COUNTY WATER DISTRICT

BUSINESS OFFICE

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April 12, 2010

Ms. Lixin Fu
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Re: Copper Cove / Pond 6 Dam Enlargement, CCWD CIP 15047
Comments to the Copper Cove Tentative WDR

Dear Lixin:

Thank you for allowing time for us to review and comment on the Tentative Waste Discharge Requirements for the Copper Cove Wastewater Treatment Plant. We also plan to be in attendance at the Board meeting in May. Our comments are as follows:

Order No. R5-2010-XXX

Findings

Page No. / Item#	Comment
2 / #13	Prior to 2006, Pond #5 collected storm water and was released to the local creek. After 2006, due to the heavy rains, Pond #5 was used to store effluent on an emergency basis. Storage in Pond # 5 is pumped back to Pond #6 for reuse.
4 / #23	The LAA is also used to draw down the remaining volume of effluent in Pond #6 to ensure an empty reservoir for the winter season.
12 / #50.e	The District has various operation manuals for the plant. The District will be incorporating these manuals into an O&M plan.

Order

Page No. / Item#	Comment
18 / #B.2	Second sentence has word missing 'exceed'?
18 / #B.3	The LAA is also used to draw down the remaining volume of effluent in Pond #6 at the end of the irrigation season to ensure an empty reservoir for the winter season.

Page No. / Item#	Comment
19 / #B.10	What is the expectation of keeping the weeds, dead algae, and other vegetation from accumulating on the surface of the ponds? There is abundance of duckweed that cannot be reasonably controlled and removed. The District's current level of pond maintenance has been adequate.
20 / #C.2	Does the agronomic rate need to be specified or is this an observation?
23 / #G.1.a	We believe that monitoring MW-3 does not provide additional value being that MW-4 is immediately downstream. We request that MW-3 no longer be monitored.
24 / #G.1.c.iii	The SCGC operates and controls the recycled water distribution system per the NPDES permit. A copy of the system can be included in the O&M Plan.
Attachment B	Change LAA to 35 acre
Attachment C	Show pond #5 after pond #4.

Monitoring and Reporting

Page No. / Item#	Comment
3 / pond inspections	Inspections of the ponds as described are very subjective and will not change weekly. Are there specific issues that these criteria are linked to, such as mosquito abatement? A performance based inspection may be more appropriate.
4 / table	This is not currently required. The LAA is not used often. This proposed type of monitoring appears to be more geared to a fulltime land application operation. The District requests that this be deleted from the permit and continue its current level of reporting.

Information Sheet

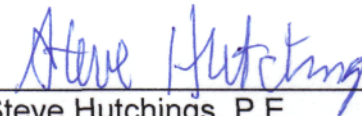
Page No. / Item#	Comment
1 / Background	Change LAA acreage to 35 ac.
3 / Antidegradation	The last paragraph; the LAA is for emergencies and is used to draw down the remaining effluent in the reservoir at the end of the season to ensure an empty reservoir for the winter.

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There is a significant increase in monitoring, reporting, and developing new management plans with this new permit even though the treatment process is unchanged. These added requirements will impact an already stressed budget and increase of operator time. As noted above, we believe that some of the monitoring/reports could be deleted or have less reporting frequency without compromising the data necessary to evaluate the performance of the plant. The Copper Cove Plant has an excellent history of compliance and operating without violations. The District will continue to operate the plant in the same manner.

Thank you for all of your work and willingness to help us with this permit. We look forward to finalizing this permit.

Sincerely,



Steve Hutchings, P.E.
District Engineer

SH/tb

cc: Kevin Kennedy, HDR, Inc.